

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Elements of Offense Charged: Count 1- Distribution of Child Pornography

1. On or about August 15, 2015, the defendant knowingly received a computer image file entitled *63ce8364ab78963deb3f16fc062f1b59.JPG*;
 2. Image file *63ce8364ab78963deb3f16fc062f1b59.JPG* contained child pornography;
 3. The defendant knew that one or more persons depicted in image file *63ce8364ab78963deb3f16fc062f1b59.JPG* was under the age of eighteen years, and;
 4. Image file *63ce8364ab78963deb3f16fc062f1b59.JPG* was shipped in interstate commerce.

Penalties for 2252A(2)(B)&(b)

Not less than 5 years up to 20 years imprisonment, a \$250,000 fine, or both; no more than 5 years supervised release; \$100 special assessment.

Elements of Offense Charged: Count 2- Receipt of Child Pornography

1. On or about August 14, 2015, the defendant knowingly received a computer image file entitled *12f5223e9973ceabcaafe6bd0a87d142.JPG*;
 2. Image file *12f5223e9973ceabcaafe6bd0a87d142.JPG* contained child pornography;

3. The defendant knew that one or more persons depicted in image file *12f5223e9973ceabcaafe6bd0a87d142.JPG* was under the age of eighteen years, and;
4. Image file *12f5223e9973ceabcaafe6bd0a87d142.JPG* was shipped in interstate commerce.

Penalties for 2252A(2)(B)&(b)

Not less than 5 years up to 20 years imprisonment, a \$250,000 fine, or both; no more than 5 years supervised release; \$100 special assessment.

Respectfully submitted,

DONALD S. BOYCE
United States Attorney

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s/Christopher R. Hoell
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